



Zwerling, Schachter & Zwerling, LLP
Counselors at Law

September 17, 2021

VIA ECF

The Honorable Nina Gershon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *In re Restasis (cyclosporine ophthalmic emulsion) Antitrust Litigation*
Case No. 18-md-2819-NG-LB

Dear Judge Gershon:

The End-Payor Plaintiffs ("EPPs") write to provide an update on settlement. The parties' written settlement agreement is awaiting final approval from Allergan's senior management. EPPs and Allergan anticipate that a motion for preliminary approval will be filed no later than October 1, 2021.

Respectfully submitted,

By: /s/ Eric B. Fastiff
Eric B. Fastiff
Adam Gitlin
Dan Drachler (DD 1526)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
efastiff@lchb.com
agitlin@lchb.com
ddrachler@lchb.com

*Interim Co-Lead Counsel for the End-Payor
Class Plaintiffs*